

**CLIFTON BUDD & DEMARIA, LLP**  
ATTORNEYS AT LAW

THE EMPIRE STATE BUILDING  
350 FIFTH AVENUE, 61ST FLOOR  
NEW YORK, NY 10118

TEL 212.687.7410  
FAX 212.687.3285  
WWW.CBDM.COM

April 15, 2021

**VIA ECF**

Hon. Vernon S. Broderick, USDJ  
United States District Court  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

APPLICATION GRANTED  
SO ORDERED   
VERNON S. BRODERICK  
U.S.D.J. 4/19/2021

Re: *Emanuel Preldakaj v. The Monarch Condominium, et al.*,  
Case No. 1:20-cv-09433 (VSB)

Dear Judge Broderick:

This firm represents the Defendants in the above-referenced action. Pursuant to Sections 1.A and 1.G of Your Honor's Individual Rules & Practices in Civil Cases, we write to respectfully request, on consent, a second extension of the stay currently in effect in the above-captioned action, from Friday, April 16, 2021, through Friday, April 30, 2021.

This is the second request for an extension of the stay of proceedings so ordered by this Court on December 22, 2020. *See* Dkt. 15. Defendants had sought the stay, on consent, to permit the parties to engage in mandatory mediation concerning the claims in this matter, as required by the applicable collective bargaining agreement. *See* Dkt. 14. The parties participated in a mediation session on Wednesday, March 24, and, subsequently, a second mediation session on Tuesday, April 13. These sessions have been productive, and the parties have jointly agreed to reconvene for a third mediation session, to be held on Friday, April 23. There are no scheduled hearings or appearances in this matter that would be affected by the requested extension.

Accordingly, and to permit the parties additional time for the parties to complete the mediation process and attempt resolution of their dispute, Defendants respectfully request with Plaintiff's consent that the Court extend its prior stay of all proceedings and any pending deadlines in this matter through April 30, 2021.

We greatly appreciate the Court's time and attention to this matter.

Respectfully Submitted,

CLIFTON BUDD & DEMARIA, LLP

Attorneys for Defendants



By: Stephen P. Pischl

**CLIFTON BUDD & DEMARIA, LLP**

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April 15, 2021

Page 2

cc:     VIA ECF  
MC LAUGHLIN STERN  
*Attorneys for Plaintiff*